



IDEM
Office of Air Management
Rules Guidance

September 1998

**DEVELOPMENT OF AMENDMENTS TO RULES CONCERNING PARTICULATE
MATTER AND SULFUR DIOXIDE EMISSIONS FOR NATIONAL STARCH AND
CHEMICAL COMPANY, INDIANAPOLIS, INDIANA**
LSA Document #98-111

FACT SHEET

Overview

The proposed amendments would revise the specific rule sections under 326 IAC 6-1-12(a) and 326 IAC 7-4-2(31) to reflect the equipment and operations that are currently in use at National Starch and Chemical Company. The proposed amendments would also revise the rule to include current operating permit limits.

Citations Affected

Amends: 326 IAC 6-1-12
326 IAC 7-4-2(31)

Affected Persons

National Starch and Chemical Company.
The public will be exposed to less particulate and sulfur dioxide emissions.

Potential Cost

Low, because the rulemaking eliminates limitations for equipment or operations no longer in operation and allows for some increased limits.

Description

National Starch and Chemical Company (National Starch) operates a processing and production plant in

Indianapolis, Indiana. As part of the Marion County control strategy for particulates, National Starch was included under 326 IAC 6-1-12(a), Nonattainment area particulate limitations: Marion County and has unit-specific particulate emission limitations for various equipment and processes at the plant. Since the original limitations were adopted in the rules in 1979, National Starch has made changes at the plant. Although National Starch received the proper permit approvals for the changes, 326 IAC 6-1-12(a) was not revised to reflect the changes at the plant. National Starch has also eliminated or shut down various units or operations at the plant; these changes are also not reflected in the current rule. Overall, the changes at the plant have resulted in a decrease in emissions at the plant and the rule amendments would reflect that decrease.

National Starch also has unit-specific limitations under 326 IAC 7-4-2(31), Sulfur dioxide emission limitations: Marion County for four (4) boilers located at the Indianapolis plant. These coal-fired boilers have been shut down and National Starch

has requested that the limitations for the boilers be removed to reflect the status of these boilers.

The revisions to 326 IAC 6-1-12 limitations require air quality modeling to be performed. The modeling is required to document that any revisions to the particulate emission limitations included under 326 IAC 6-1-12(a) do not violate or allow a violation of the National Ambient Air Quality Standards (NAAQS). IDEM has reviewed air quality modeling based on the revised limits and has determined that these changes, which reflect a decrease in total emissions, will not result in an adverse impact to air quality.

Consistency with Federal Requirements

The amended rules are consistent with federal laws and rules.

Consideration of Factors Outlined in Indiana Code 13-14-8-4

Indiana Code 13-14-8-4 requires that in adopting rules and establishing standards, the board shall take into account:

- 1) all existing physical conditions and the character of the area affected;
- 2) past, present, and probably future uses of the area, including the character of the uses of surrounding areas
- 3) zoning classifications;
- 4) the nature of the existing air quality or existing water quality as the case may be;
- 5) technical feasibility, including the quality conditions that could reasonably be achieved through coordinated control of all factors affecting the quality; and
- 6) economic reasonableness of measuring or reducing any particular type of pollution.

The board shall also take into account the right of all persons to an environment sufficiently uncontaminated as not to be injurious to human, plant, animal, or aquatic life or to the reasonable enjoyment of life and property.

IDEM Contact

Additional information regarding this rule making action can be obtained from Roger Letterman, Rules Development Section, Office of Air Management, (317) 232-8342 or (800) 451-6027, extension 2-8342 (in Indiana).